

June 15, 2004

Regarding Over-the-Air television viewership with respect to digital television, I would like to submit the following comments:

1. In my DMA (Burlington, VT-Plattsburgh, NY) currently there are no commercial stations broadcasting digitally. All commercial stations that are converting to digital format at this point have agreed on a plan to collocate their antennas atop Mount Mansfield in Vermont, however they now must obtain an Act 250 permit to construct their facilities. Due to the extensive permitting process in Vermont, it will likely take at least one year to file the permit and another year to hear any appeals. At any rate, it is likely that due to this process and winter weather conditions, construction will not begin until spring of 2006 with broadcasting likely commencing that summer, best case. To my knowledge, none of the commercial stations even have plans for temporary low-power STA operation.
2. Due to the way the law currently works, I am not able to receive distant network feeds from my MVPD (Dish Network) for HDTV even though my local broadcaster does not provide me with a digital television signal. Even in the foreseeable future, it is unlikely that satellite will be able to provide local into local for HDTV broadcasts. Therefore, even though I do subscribe to a MVPD, I rely on OTA for local network programming.
3. I currently have 3 television sets that are either analog or merely HDTV-ready (DTV tuners are not built into them). I have NO television sets that are capable or receiving OTA DTV signals.

My chief concern is that with DTV service not likely to begin for commercial stations in this DMA until the summer of 2006, only six months of transition is allowed for if the FCC were to mandate a 12/31/06 end to analog broadcasting.

To ease this transition, I would suggest that in the event local stations cannot deliver a sufficient DTV signal, that satellite providers be allowed to provide a distant signal in the same way that if I cannot receive a sufficient analog signal, I am allowed to receive a distant analog station from my satellite provider. This will allow me to invest in an HDTV receiver for my sets on a more gradual schedule rather than having to buy 3 receivers in a single 6 month period. I currently have no motivation to buy an HDTV receiver since I am primarily interested in watching network television, yet am incapable and not allowed to receive a DTV signal for network programming from any source.

Sincerely,
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